

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THERESA ROMANO, L.R. BLAKE)	
TRUST, and Concetta Romano,)	CA No. 03-12626-MLW
Plaintiffs)	
)	
v.)	
)	
ARBELLA MUTUAL INSURANCE CO.,)	
Defendants)	

PLAINTIFFS', THERESA ROMANO, LR BLAKE TRUST, AND CONCETTA ROMANO, MOTION TO CONTINUE HEARING RE: DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND PLAINTIFFS' OPPOSITION THERETO, AND TO ENLARGE TIME TO FILE THEIR OPPOSITION TO THE DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Now come the plaintiffs, Theresa Romano, L.R. Blake Trust, and Concetta Romano, in the above-captioned proceeding, and respectfully request that this Honorable Court continue the hearing re: the Defendant's Motion for Summary Judgment, Plaintiffs' Opposition thereto, and enlarge the time in which the Plaintiffs must file their Opposition to the Defendant's Motion for Summary Judgment. As grounds therefor, the Plaintiffs state as follows:

1. That Austin J Freeley and Stephen Hrones, counsel to the Plaintiffs, have had heavy trial and appellate schedules this summer; and, in fact, attorney Hrones currently is trying a civil rights case which commenced on Monday, August 16, 2004, in Federal District Court before the Honorable Nathaniel M Gorton in the matter of *William Quiles, et al., v. Joaquin Kilson, et al.*, C.A. No. 98-40242, and therefore has been unable to work with attorney Freeley in the preparation of the Plaintiffs' Opposition;

2. That the Plaintiffs are requesting a continuance of the hearing by two weeks, from August 20, 2004 to September 3, 2004, and an enlargement of time to file their Opposition by

one week, from August 20, 2004 to August 27, 2004;

3. That this is the Plaintiffs' first request for a continuance and enlargement of time, both of which are reasonable and necessary in order that their counsel be able to properly prepare for the hearing and draft the Plaintiffs' Opposition; and,

4. That the Defendant's counsel, Nicholas A Kenney, assents to the Motion to Continue the Hearing and Motion to Enlarge Time to File Plaintiffs' Opposition.

WHEREFORE, the Plaintiffs respectfully request that this Honorable Court grant their Motion to Continue the Hearing to September 3, 2004, and their Motion to Enlarge Time to File Plaintiffs' Opposition to August 27, 2004.

Respectfully submitted,
The Plaintiffs Theresa Romano, *et al.*,
By their attorneys,

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CERTIFICATE OF SERVICE

I, Stephen Hrones, hereby certify that, on this 18th day of August, 2004, I have served a true and correct copy of the foregoing PLAINTIFFS', THERESA ROMANO, LR BLAKE TRUST, AND CONCETTA ROMANO, MOTION TO CONTINUE HEARING RE: DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND PLAINTIFFS' OPPOSITION THERETO, AND TO ENLARGE TIME TO FILE THEIR OPPOSITION TO THE DEFENDANT'S MOTION FOR SUMMARY JUDGMENT by United States First-Class Mail, postage prepaid, as follows: Lewis C Eisenberg, Esq., Nicholas A Kenney, Esq., COSGROVE EISENBERG & KILEY, 803 Hancock St, POB 189, Quincy, MA 02170.

//S//Stephen Hrones
Stephen Hrones